

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

A&B CAMPBELL FAMILY LLC, *et al.*,

Plaintiffs

v.

CHESAPEAKE ENERGY, CORP. *et al.*,

Defendants.

CIVIL ACTION NO. 3:15-0340

(JUDGE MANNION)

JAMES L. BROWN, *et al.*,

Plaintiffs

v.

**ACCESS MIDSTREAM PARTNERS,
L.P., *et al.*,**

Defendants.

CIVIL ACTION NO. 3:14-0591

(JUDGE MANNION)

**DEMCHAK PARTNERS LIMITED
PARTNERSHIP, *et al.*,**

Plaintiffs,

v.

CHESAPEAKE APPALACHIA, L.L.C.,

Defendant.

CIVIL ACTION NO. 3:13-2289

(JUDGE MANNION)

**THE SUESSENBACH FAMILY
LIMITED PARTNERSHIP, *et al.*,**

Plaintiffs

v.

**ACCESS MIDSTREAM PARTNERS,
L.P., *et al.*,**

Defendants.

CIVIL ACTION NO. 3:14-1197

(JUDGE MANNION)

MOTION TO EXTEND THE DEADLINE FOR STATUS REPORTS

The Chesapeake Defendants in the above captioned actions hereby seek to extend by one business day, until Tuesday, August 8, 2023, their deadline to submit Status Reports addressing the status of the voluntary Chapter 11 petitions of Chesapeake Energy Corporation and its subsidiaries (collectively referred to herein as “Chesapeake” or “Reorganized Debtors”) in the United States Bankruptcy Court for the Southern District of Texas in light of the Fifth Circuit’s opinion and the posture of the proceedings before the Bankruptcy Court. In support of this request, Chesapeake asserts as follows:

1. On July 27, 2023, Chesapeake filed a Motion to Enforce (the “Motion”) with the United States Bankruptcy Court for the Southern District of Texas seeking entry of an order (a) enforcing the Confirmation Order and Plan, and requiring the plaintiffs in the Pennsylvania Royalty Cases, including in the above-captioned matters, to dismiss their pre-Effective Date claims against the Reorganized Debtors; and (b) declaring that the MEC Settlement and the Non-MEC Settlement are null and void. Chesapeake Mot., *In re Chesapeake Exploration, L.L.C.*, Case No. 20-33239 (DRJ) (Bankr. S.D. Tex. Jul. 27, 2023) (Docket No. 322).

2. In a filing titled Notice of Motion dated July 31, 2023, Chesapeake provided this Court with a copy of the Motion.

3. Pursuant to the Court’s July 17, 2023 Orders in *A & B Campbell Family, et al., v. Chesapeake Energy Corporation, et al.*, Case No. 3:15-340 (M.D.

Pa.) (Docket No. 170); *Brown v. Access Midstream Partners, L.P.*, No. 3:14-cv-00591-MEM (M.D. Pa.) (Docket No. 210); *Demchak Partners Ltd. Partnership v. Chesapeake Appalachia, L.L.C.*, No. 3:13-cv-02289-MEM (M.D. Pa.) (Docket No. 236); *Suessenbach Family Ltd. Partnership v. Access Midstream Partners, L.P.*, No. 3:14-cv-01197-MEM (M.D. Pa.) (Docket No. 162), Chesapeake continues to assemble Status Reports addressed to the status of the voluntary Chapter 11 petitions and posture of the proceedings before the Bankruptcy Court in light of the Fifth Circuit's opinion.

4. Chesapeake respectfully seeks a brief extension until Tuesday, August 8, 2023 to finalize its Status Reports.

WHEREFORE, Chesapeake respectfully seeks a one-day extension until August 8, 2023 to file its Status Reports addressed to the posture of the proceedings before the Bankruptcy Court in light of the Fifth Circuit's opinion.

Dated: August 7, 2023

Respectfully submitted,

/s/ John B. Dempsey

Daniel T. Brier

John B. Dempsey

Richard L. Armezzani

Myers Brier & Kelly, LLP

425 Spruce Street, Suite 200

Scranton, PA 18503

(570) 342-6100

Daniel T. Donovan (*pro hac vice*)

Kirkland & Ellis LLP

1301 Pennsylvania Avenue, N.W.

Washington, D.C. 20004

(202) 379-5000

Attorneys for the Chesapeake

Defendants

CERTIFICATE OF SERVICE

I, John B. Dempsey, hereby certify that a true and correct copy of the foregoing was served upon all counsel who have appeared in these actions via the Court's Electronic Case Filing System on this 7th day of August 2023.

/s/ John B. Dempsey
John B. Dempsey